

REMARKS

Claim 70 under is rejected 35 U.S.C. §102 as anticipated by Minick, a newly cited reference. Claims 62-69 are rejected under 35 U.S.C. §103 with a new combination of references – Minick further in view of Yamazaki.

Claim 62 distinguishes at least by reciting placing the three cylindrical bodies with the wound unit in a container with said wound unit resting on a support surface structure in the container and extracting the endless belt from the container such that as the third cylindrical body is being raised upwardly from the container said wound unit unwinds while it is resting on, being supported by, and slides along said support surface structure. The primary reference Minick shows the wound unit in Figure 1 but bands 16 are provided to hold the wound unit with the three tubes together in a triangle configuration. This wound unit together with the bands 16 thereon is placed into a container – see column 2, lines 64-66. Yamazaki, on the other hand, shows the three tubes in a line in Figure 8 held together in three notches 11a, 11b and 11c.

Minick teaches directly away from the invention because with his bands 16 placed around the three tubes in a triangular configuration, when removing this bundle from the container, all three tubes would be removed at the same time because of the banding 16. Thus it is not possible that Minick could teach an unwinding of the wound unit as it is removed from the container. It is also not possible that Minick could teach the wound unit unwinding while it is resting and being supported by and slides along the support surface structure in the container. Minick never mentions any support surface in his container.

Yamazaki also teaches directly away from the invention because in Yamazaki he also prevents any unwinding while it is resting on his notched or grooved support

surface. In Figure 8 or Figure 6 of Yamazaki, there are three grooves or notches 11a, 11b, and 11c which would prevent any such sliding unwinding operation.

With the present invention, the belt is protected inside the container while it unwinds by sliding as it is resting on and being supported by and slides along the support surface structure. It thus unwinds by sliding (to prevent damage) along a surface inside the container while the container is protecting it from damage caused by external forces or objects.

For the above reasons, it is impossible that a combination of Minick and Yamazaki, both of which teach directly away from the invention, could ever suggest claim 62.

Dependent claims 63-69 distinguish at least for the reasons noted with respect to claim 62 and also by reciting additional features not suggested.

Container system claim 70 distinguishes at least by reciting the container having a support surface structure supporting said wound unit, said support surface structure being shaped such that when the third cylindrical body is pulled upwardly during removal from said container, said wound unit rests on, is supported by, and slides along said support structure surface during unwinding of said wound unit. This feature distinguishes over both Minick and Yamazaki for the same reasons noted with respect to claim 62.

Allowance of the application is respectfully requested.

The Commissioner is hereby authorized to charge any additional fees which may be required, or to credit any overpayment to account No. 501519.

Respectfully submitted,



Brett A. Valiquet

(Reg. No. 27,841)

Brett A. Valiquet
Schiff Hardin LLP
Patent Department
Suite 6600 233 S. Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 258-5786
Attorneys for Applicants.
CUSTOMER NO. 26574

CH2\8486807.1